

POINT RUSTON



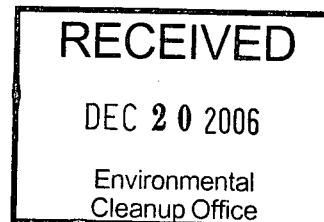
5219 N. Shirley St., Suite 100
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9.3.3
12-15-06

December 15, 2006

Mr. Kevin L. Rochlin
Remedial Project Manager
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue, ECL-111
Seattle, WA 98101



RE: Monthly Report: No. 126, November 2006
Operable Unit No. 02
Asarco Tacoma Smelter Site

Dear Mr. Rochlin:

Point Ruston is submitting this monthly report per the requirements of paragraph 48 of the Consent Decree for the above referenced site. Point Ruston will continue to provide monthly reports to EPA for the site organized in the same manner as previous reports prepared by Asarco to follow item (a) through (g) of this paragraph.

If you have any questions, please call me.

Sincerely,

Sue O'Neill
Development Project Manager

Attachment (4 copies)

cc: Chung Ki Yee - Washington Department of Ecology
Doug Holsten - CH2MHill (2 copies)
Richard Kauffman - ATSDR c/o U.S. EPA Region 10
Leslie Ann Rose - Citizens for a Healthy Bay



Monthly Report No. 126, November 2006

Operable Unit 02

Asarco Tacoma Smelter Site

A. *Actions taken to achieve compliance with the Consent Decree during the previous month.*

1. A regular monthly design review meeting was not held in November.
2. Amendments to Asarco's final Upland Remediation Design (September 2006) are being prepared consistent with the Second Amendment to the Consent Decree.
3. Remedial Action activities continued.

B. *Summary of sampling, tests, and all other data received or generated by Asarco in the previous month.*

1. Outfall activities including the following:

Section 2.3 of the Final Statement of Work (SOW) for Remedial Design and Remedial Action – Exhibit F to the Second Amendment requires Point Ruston to continue outfall monitoring. Outfalls will be monitored to determine if the monthly average surface water outfall concentrations for arsenic, copper, and zinc exceed 0.5 ppm at the North and South site outfalls until they are abandoned.

Weekly composite samples will be collected at each outfall during the construction season. During the winter season, outfall samples will be collected every other month. Asarco began the following schedule in May of 2003 which Point Ruston will continue to implement: weekly composite samples will be collected from May-October, and in December, February, and April.

Monthly averages and individual results for samples collected by Asarco in October are attached. The average discharge for the North Outfall exceeded the interim discharge limits due to exceedances in the October 16th outfalls caused by runoff from the Stack Hill excavation. EPA was notified and water was diverted to sediment ponds on the site.

2. Point Ruston collects OCF leachate in a 5,000 gallon polyethylene tank for offsite shipment and disposal. LCRS and LDCRS volumes are monitored weekly in accordance with the draft OCF OMMP. LCRS volumes currently average approximately 209 gallons per day on the LCRS. Point Ruston shipped 4,500 gallons of non-hazardous leachate (4.83 ppm results attached) on November 20, 2006.

Monthly Report No. 126, November 2006
Operable Unit 02
Asarco Tacoma Smelter Site

C. *Work Plans and other deliverables completed and submitted during the previous month.*

1. No comments were received from EPA during the month of November.
2. Remedial Action during November included the following tasks:
 - OCF construction activities:
 - Maintained leachate collection system and shipped leachate for offsite treatment as necessary to maintain adequate storage capacity in the temporary storage tank.
 - Source Area construction activities:
 - Installed and maintained erosion and surface water controls
 - Site Capping construction activities:
 - Maintained subgrade areas at the site
 - Site-wide remediation activities:
 - Continued surface water controls
 - Maintained haul roads and stockpiles onsite
 - Sediment Capping activities:
 - Began placement of sediment cap using material from the Port of Tacoma's Blair Waterway dredging project on November 16.

D. *Actions scheduled for the next six weeks.*

1. Point Ruston does not expect to receive comments from EPA on any submittals at this time.
2. The following Remedial Action tasks are planned to continue:
 - RA Monitoring:
 - Outfall sampling (weekly composite samples) during scheduled months
 - OCF construction activities:
 - Continue collection of leachate for offsite disposal
 - Continue monitoring of leachate volumes
 - Source Area construction activities:
 - Erosion controls and site maintenance
 - Begin removal of stack foundation
 - Site Capping construction activities:
 - Continue to maintain subgrade areas at the site
 - Site-wide construction activities:
 - Continue surface water controls
 - Maintain roads and stockpiles onsite
 - Sediment Capping activities:
 - Continue placement of sediment cap using material from the Port of Tacoma's Blair Waterway dredging project

Monthly Report No. 126, November 2006

Operable Unit 02

Asarco Tacoma Smelter Site

E. Percentage completion, unresolved delays encountered or anticipated that may affect schedule, and efforts to mitigate delays.

1. Point Ruston Final Remediation Design is approximately 60% complete.

F. Modifications to work plans or schedules proposed to or approved by EPA.

1. The Second Amendment to the Consent Decree was finalized and the sale of the property to Point Ruston LLC completed on October 31, 2006.
2. Point Ruston will submit a schedule to EPA for preparation of addenda to the remedial design prepared by Asarco in accordance with paragraph 30a of the Second Amendment.

G. Activities undertaken to support Community Relations Plan during the previous month and planned for the next four weeks.

1. Point Ruston attends the Town of Ruston's Town Council meetings routinely to answer question or give briefings regarding the status of RA and development planning activities (1st and 3rd Monday of each month).
2. Point Ruston is working with the City of Tacoma on development plans which incorporate remediation components for the site.
3. Point Ruston is working with MetroParks to incorporate the capping component into the Peninsula Park design.
4. Point Ruston meets with the Town of Ruston, City of Tacoma and MetroParks to address operation, maintenance, and monitoring issues at the site.

Table 1. Summary of October 2006 Outfall Data for As, Cu, and Zn Compared to SOW Limit

Location	As Conc. ppm	% of SOW Limit*	Cu Conc. ppm	% of SOW Limit*	Zn Conc. ppm	% of SOW Limit*
South Outfall	0.056	11.20%	0.024	4.80%	0.023	4.50%
North Outfall	0.762	152.36%	1.702	340.40%	0.646	129.20%

* 0.5 ppm is the limit of As, Cu, and Zn allowed as documented in the SOW.

Point Ruston
Tacoma Effluent Report

South Outfall (001)
Oct-06

Sample Date	mg/L		
	As	Cu	Zn
10/2	0.072	0.030	0.020
10/9	0.049	0.020	ND
10/16	0.053	0.020	0.030
10/23	0.072	0.040	0.030
10/31	0.034	0.010	0.010
Monthly Avg*	0.056	0.024	0.023
Ave lbs/day	0.0000	0.0000	0.0000

Point Ruston
Tacoma Effluent Report

North Outfall (004)
Oct-06

Sample Date	mg/L		
	As	Cu	Zn
10/2	0.055	0.100	0.100
10/9	0.051	0.040	0.040
10/16	3.570	8.270	3.010
10/23	0.091	0.080	0.060
10/31	0.042	0.020	0.020
Monthly Avg*	0.762	1.702	0.646
Ave lbs/day	0.0000	0.0000	0.0000



ANALYTICAL SUMMARY REPORT

November 09, 2006

Karen Pickett

Asarco, LLC

5219 N Shirley St, Ste 100

Ruston, WA 98407

Workorder No.: B06102208

Project Name: Outfall Monitoring, Tacoma Smelter

Energy Laboratories Inc received the following 10 samples from Asarco, LLC on 10/31/2006 for analysis.

Sample ID	Client Sample ID	Collect Date	Receive Date	Matrix	Test
B06102208-001	TSM 10 06 402	10/02/06 10:00	10/31/06	Aqueous	Metals by ICP/ICPMS, Total Metals Digestion by EPA 200.2
B06102208-002	TSM 10 06 102	10/02/06 10:30	10/31/06	Aqueous	Same As Above
B06102208-003	TSM 10 06 409	10/09/06 9:00	10/31/06	Aqueous	Same As Above
B06102208-004	TSM 10 06 109	10/09/06 9:30	10/31/06	Aqueous	Same As Above
B06102208-005	TSM 10 06 416	10/16/06 9:00	10/31/06	Aqueous	Same As Above
B06102208-006	TSM 10 06 116	10/16/06 9:30	10/31/06	Aqueous	Same As Above
B06102208-007	TSM 10 06 423	10/23/06 9:45	10/31/06	Aqueous	Same As Above
B06102208-008	TSM 10 06 123	10/23/06 10:15	10/31/06	Aqueous	Same As Above
B06102208-009	TSM 10 06 430	10/30/06 9:45	10/31/06	Aqueous	Same As Above
B06102208-010	TSM 10 06 130	10/30/06 10:15	10/31/06	Aqueous	Same As Above

There were no problems with the analyses and all data for associated QC met EPA or laboratory specifications except if noted in report comments or the Case Narrative.

If you have any questions regarding these tests results, please call.

Report Approved By: 



ENERGY LABORATORIES, INC. • P.O. Box 30916 • 1120 South 27th Street • Billings, MT 59107-0916
800-735-4489 • 406-252-6325 • 406-252-6069 fax • eli@energylab.com

LABORATORY ANALYTICAL REPORT

Client: Asarco, LLC
Project: Outfall Monitoring, Tacoma Smelter
Lab ID: B06102208-002
Client Sample ID: TSM 10 06 102

Report Date: 11/09/06
Collection Date: 10/02/06 10:30
Date Received: 10/31/06
Matrix: Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
METALS, TOTAL							
Arsenic	0.072	mg/L		0.005		E200.8	11/03/06 22:00 / car
Copper	0.03	mg/L		0.01		E200.8	11/03/06 22:00 / car
Zinc	0.02	mg/L		0.01		E200.8	11/03/06 22:00 / car

Report RL - Analyte reporting limit.
Definitions: QCL - Quality control limit.

MCL - Maximum contaminant level.
ND - Not detected at the reporting limit.



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LABORATORY ANALYTICAL REPORT

Client: Asarco, LLC
Project: Outfall Monitoring, Tacoma Smelter
Lab ID: B06102208-001
Client Sample ID: TSM 10 06 402

Report Date: 11/09/06
Collection Date: 10/02/06 10:00
Date Received: 10/31/06
Matrix: Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
METALS, TOTAL							
Arsenic	0.055	mg/L		0.005		E200.8	11/03/06 21:53 / car
Copper	0.10	mg/L		0.01		E200.8	11/03/06 21:53 / car
Zinc	0.10	mg/L		0.01		E200.8	11/03/06 21:53 / car

Report
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LABORATORY ANALYTICAL REPORT

Client: Asarco, LLC
Project: Outfall Monitoring, Tacoma Smelter
Lab ID: B06102208-004
Client Sample ID: TSM 10 06 109

Report Date: 11/09/06
Collection Date: 10/09/06 09:30
Date Received: 10/31/06
Matrix: Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
METALS, TOTAL							
Arsenic	0.049	mg/L		0.005		E200.8	11/03/06 22:14 / car
Copper	0.02	mg/L		0.01		E200.8	11/03/06 22:14 / car
Zinc	ND	mg/L		0.01		E200.8	11/03/06 22:14 / car

Report RL - Analyte reporting limit.
Definitions: QCL - Quality control limit.

MCL - Maximum contaminant level.
ND - Not detected at the reporting limit.



LABORATORY ANALYTICAL REPORT

Client: Asarco, LLC
Project: Outfall Monitoring, Tacoma Smelter
Lab ID: B06102208-003
Client Sample ID: TSM 10 06 409

Report Date: 11/09/06
Collection Date: 10/09/06 09:00
Date Received: 10/31/06
Matrix: Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
METALS, TOTAL							
Arsenic	0.051	mg/L		0.005		E200.8	11/03/06 22:07 / car
Copper	0.04	mg/L		0.01		E200.8	11/03/06 22:07 / car
Zinc	0.04	mg/L		0.01		E200.8	11/03/06 22:07 / car

Report
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LABORATORY ANALYTICAL REPORT

Client: Asarco, LLC
Project: Outfall Monitoring, Tacoma Smelter
Lab ID: B06102208-006
Client Sample ID: TSM 10 06 116

Report Date: 11/09/06
Collection Date: 10/16/06 09:30
Date Received: 10/31/06
Matrix: Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
METALS, TOTAL							
Arsenic	0.053	mg/L		0.005		E200.8	11/03/06 22:28 / car
Copper	0.02	mg/L		0.01		E200.8	11/03/06 22:28 / car
Zinc	0.03	mg/L		0.01		E200.8	11/03/06 22:28 / car

Report
Definitions: RL - Analyte reporting limit.
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LABORATORY ANALYTICAL REPORT

Client: Asarco, LLC
Project: Outfall Monitoring, Tacoma Smelter
Lab ID: B06102208-005
Client Sample ID: TSM 10 06 416

Report Date: 11/09/06
Collection Date: 10/16/06 09:00
Date Received: 10/31/06
Matrix: Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
METALS, TOTAL							
Arsenic	3.57	mg/L		0.005		E200.8	11/03/06 22:21 / car
Copper	8.27	mg/L		0.01		E200.8	11/03/06 22:21 / car
Zinc	3.01	mg/L		0.01		E200.8	11/03/06 22:21 / car

Report
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LABORATORY ANALYTICAL REPORT

Client: Asarco, LLC
Project: Outfall Monitoring, Tacoma Smelter
Lab ID: B06102208-008
Client Sample ID: TSM 10 06 123

Report Date: 11/09/06
Collection Date: 10/23/06 10:15
Date Received: 10/31/06
Matrix: Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
METALS, TOTAL							
Arsenic	0.072	mg/L		0.005		E200.8	11/03/06 23:09 / car
Copper	0.04	mg/L		0.01		E200.8	11/03/06 23:09 / car
Zinc	0.03	mg/L		0.01		E200.8	11/03/06 23:09 / car

Report RL - Analyte reporting limit.
Definitions: QCL - Quality control limit.

MCL - Maximum contaminant level.
ND - Not detected at the reporting limit.



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LABORATORY ANALYTICAL REPORT

Client: Asarco, LLC
Project: Outfall Monitoring, Tacoma Smelter
Lab ID: B06102208-007
Client Sample ID: TSM 10 06 423

Report Date: 11/09/06
Collection Date: 10/23/06 09:45
Date Received: 10/31/06
Matrix: Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
METALS, TOTAL							
Arsenic	0.091	mg/L		0.005		E200.8	11/03/06 22:35 / car
Copper	0.08	mg/L		0.01		E200.8	11/03/06 22:35 / car
Zinc	0.06	mg/L		0.01		E200.8	11/03/06 22:35 / car

Report RL - Analyte reporting limit.
Definitions: QCL - Quality control limit.

MCL - Maximum contaminant level.
ND - Not detected at the reporting limit.



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LABORATORY ANALYTICAL REPORT

Client: Asarco, LLC
Project: Outfall Monitoring, Tacoma Smelter
Lab ID: B06102208-010
Client Sample ID: TSM 10 06 130

Report Date: 11/09/06
Collection Date: 10/30/06 10:15
Date Received: 10/31/06
Matrix: Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
METALS, TOTAL							
Arsenic	0.034	mg/L		0.005		E200.8	11/03/06 23:23 / car
Copper	0.01	mg/L		0.01		E200.8	11/03/06 23:23 / car
Zinc	0.01	mg/L		0.01		E200.8	11/03/06 23:23 / car

Report
Definitions: RL - Analyte reporting limit.
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MCL - Maximum contaminant level.
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LABORATORY ANALYTICAL REPORT

Client: Asarco, LLC
Project: Outfall Monitoring, Tacoma Smelter
Lab ID: B06102208-009
Client Sample ID: TSM 10 06 430

Report Date: 11/09/06
Collection Date: 10/30/06 09:45
Date Received: 10/31/06
Matrix: Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
METALS, TOTAL							
Arsenic	0.042	mg/L		0.005		E200.8	11/03/06 23:16 / car
Copper	0.02	mg/L		0.01		E200.8	11/03/06 23:16 / car
Zinc	0.02	mg/L		0.01		E200.8	11/03/06 23:16 / car

Report RL - Analyte reporting limit.
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LABORATORY ANALYTICAL REPORT

Client: Point Ruston LLC
Project: Tacoma Smelter
Lab ID: B06110804-001
Client Sample ID: TSM 110608

Report Date: 11/15/06
Collection Date: 11/08/06 16:15
Date Received: 11/13/06
Matrix:

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
METALS, TOTAL							
Arsenic	4.83	mg/L		0.005		E200.8	11/14/06 17:10 / car

Leachate

Report RL - Analyte reporting limit.
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